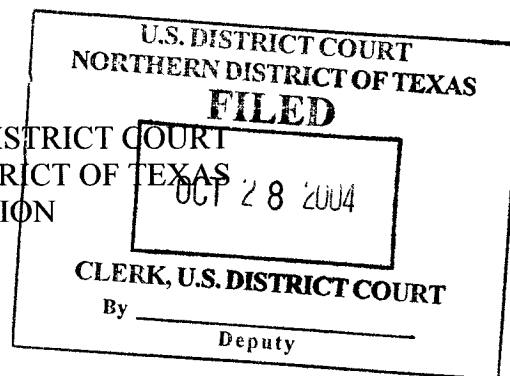


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



NOKIA CORPORATION,
Petitioner

No.

vs.

ERICSSON INC.,
Respondent.

304 CV 2320-K

NOKIA CORPORATION'S MOTION TO ENFORCE ARBITRAL SUBPOENA
PURSUANT TO 9 U.S.C. § 7

Pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et. seq.*, Petitioner Nokia Corporation ("Nokia") files this Motion to enforce an arbitral subpoena served on Respondent Ericsson Inc.

This Motion is filed contemporaneously with Nokia Corporation's Petition to Enforce Arbitral Subpoena. The Subpoena at issue is attached as Exhibit 1 to the Petition. The grounds for this Motion are fully set forth in Nokia's Petition, and in its Brief in Support, which is also filed herewith.

Respectfully submitted, this 28th day of October, 2004.

By:



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CERTIFICATE OF CONFERENCE

I hereby certify that on the 27th day of October, 2004, I discussed with Douglas A. Cawley, attorney for Ericsson, Inc., via telephone conference the above Nokia Corporation's motion to enforce arbitral subpoena pursuant to 9 U.S.C. §7. Mr. Cawley advised that he did not intend to produce the documents requested in the arbitration subpoena. Therefore, an agreement could not be reached regarding this motion.


David W. Elrod

CERTIFICATE OF SERVICE

I certify that the foregoing Nokia Corporation's Motion to Enforce the Arbitral Subpoena Pursuant to 9 U.S.C. § 7 was served, on this 28th day of October, 2004, by First

Class Mail to the following:

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A handwritten signature in black ink, appearing to read 'David W. Elrod', is written over a horizontal line.

David W. Elrod